

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
JAMES BONOMO, : 07 Civ. 5967 (CM) (KNF)  
Plaintiff, :  
: -against- : NOTICE OF MOTION  
: :  
MITSUBISHI INTERNATIONAL :  
CORPORATION, : **ORAL ARGUMENT REQUESTED**  
: :  
Defendant. :  
: ----- x

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, the declaration of James A. Batson, Esq. and the exhibits attached thereto, the pleadings and all other papers and proceedings herein, Plaintiff James Bonomo, by and through his undersigned counsel, will move before the Court (the Hon. Kevin N. Fox, presiding) at the United States Courthouse, at 500 Pearl Street, Room 540, New York, New York, for sanctions as a result of Defendant's spoliation of material evidence in this litigation, and for such other and further relief as the Court deems just and proper, including but not limited to an evidentiary hearing should the Court deem it necessary.

PLEASE TAKE FURTHER NOTICE THAT Defendant's answering papers, if any, must be served upon the undersigned attorneys by June 24, 2008, and Plaintiff must serve his reply papers, if any, by June 30, 2008.

No previous motion or application has been made requesting the relief sought by this motion.

Dated: New York, New York  
June 10, 2008

Respectfully submitted,

LIDDLE & ROBINSON, L.L.P.,

By: /s/ Jeffrey L. Liddle  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on this 10<sup>th</sup> day of June, 2008, a true and accurate copy of the attached NOTICE OF MOTION was served by ECF upon the following:

Stephen P. Sonnenberg, Esq.  
Paul, Hastings, Janofsky & Walker, L.L.P.  
75 East 55<sup>th</sup> Street  
New York, New York 10022

/s/Michael E. Grenert  
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